

**MOSES & SINGER LLP**

John V. Baranello (NJ Bar No. 033262009)  
Richard J. Corbi, Esq. (admitted *pro hac vice*)  
Mark M. Parry, Esq. (admitted *pro hac vice*)  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Tel: (212) 554-7800  
Fax: (212) 554-7700

*Proposed Conflicts Counsel to the Debtors and  
Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

FRANK THEATRES BAYONNE/SOUTH  
COVE, LLC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-34808 (SLM)

(Jointly Administered)

**Hearing Date: February 25, 2019 at 10:00 a.m.  
(ET)**

**NOTICE OF FILING REVISED ORDER FOR THE DEBTORS' MOTION FOR ENTRY  
OF AN ORDER (I) AUTHORIZING THE REJECTION OF A CERTAIN UNEXPIRED  
LEASE OF NON-RESIDENTIAL REAL PROPERTY, (II) AUTHORIZING THE  
ABANDONMENT OF RELATED PROPERTY, (III) ESTABLISHING A CLAIMS BAR  
DATE, AND (IV) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE THAT**

1. On January 25, 2019, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), filed a *Motion for Entry of an Order (I) Authorizing the Rejection of*

---

<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Frank Theatres Bayonne/South Cove, LLC (3162); Frank Entertainment Group, LLC (3966); Frank Management LLC (0186); Frank Theatres, LLC (5542); Frank All Star Theatres, LLC (0420); Frank Theatres Blacksburg LLC (2964); Frank Theatres Delray, LLC (7655); Frank Theatres Kingsport LLC (5083); Frank Theatres Montgomeryville, LLC (0692); Frank Theatres Parkside Town Commons LLC (9724); Frank Theatres Rio, LLC (1591); Frank Theatres Towne, LLC (1528); Frank Theatres York, LLC (7779); Frank Theatres Mt. Airy, LLC (7429); Frank Theatres Southern Pines, LLC (2508); Frank Theatres Sanford, LLC (7475); Frank Theatres Shallotte, LLC (7548); Revolutions at City Place LLC (6048); Revolutions of Saucon Valley LLC (1135); Frank Entertainment Rock Hill LLC (0753); Frank Entertainment PSL, LLC (7033); Frank Hospitality Saucon Valley LLC (8570); Frank Hospitality York LLC (6617); and Galleria Cinema, LLC (2529).

*a Certain Unexpired Lease of Non-Residential Real Property, (II) Authorizing the Abandonment of Related Property, (III) Establishing a Claims Bar Date and (IV) Granting Related Relief* (the “Motion”) [Docket No. 160]. Since the Debtors filed the Motion, the Debtors and various objectors impacted by the Motion have negotiated a stipulation, agreement and order (the “Order”) to resolve the Motion on a consensual basis.

2. Attached hereto as **Annex A** is a revised draft of the Order.

3. Attached hereto as **Annex B** is a blacklined version of the Order that reflects the changes made to the order originally attached to the Motion filed on January 25, 2019.

Dated: February 22, 2019

Respectfully submitted,

**MOSES & SINGER LLP**

/s/ Richard J. Corbi

John V. Baranello (NJ Bar No. 033262009)  
Richard J. Corbi, Esq. (admitted *pro hac vice*)  
Mark M. Parry, Esq. (admitted *pro hac vice*)  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Tel: (212) 554-7800  
Fax: (212) 554-7700  
jbaranello@mosessinger.com  
rcorbi@mosessinger.com  
mparry@mosessinger.com

*Proposed Conflicts Counsel to the Debtors  
and Debtors-in-Possession*